

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAW FAMILY ARCHIVES, LTD., EDITH :
MARCUS and META STEVENS,

Plaintiffs,

-against-

CMG WORLDWIDE, INC., an Indiana
Corporation and MARILYN MONROE, LLC, :
a Delaware Limited Liability Company,

Defendants.
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: Case No. 05 Civ. 3939 (CM)

: Honorable Colleen McMahon
:

DECLARATION OF LAURA WYSTMA

LAURA WYTSMA, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney at law licensed to practice before the Courts of the State of California, the United States District Court for the Central District of California, and the United States Court of Appeals for the Second Circuit, and have been admitted to practice pro hac vice as counsel for Marilyn Monroe LLC in the above captioned case. I am a partner with the law firm of Loeb & Loeb LLP, counsel of record for Marilyn Monroe LLC. I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. Certain of the documents attached to the Declaration of Jonathan Neil Strauss bear the Bates prefix "MC." That designation refers to "Millington Conroy." Mr. Conroy is the nephew of Inez Melson – Marilyn Monroe's former business manager.

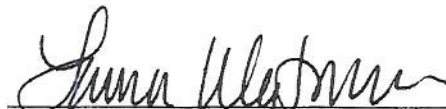
3. In September 2007, Marilyn Monroe LLC learned that Mr. Conroy had in his possession thousands of documents that formerly belonged to Marilyn Monroe. Soon after that discovery Marilyn Monroe LLC obtained a Temporary Restraining Order from the Los Angeles Superior Court to secure those documents. Attached hereto as Exhibit A is a true and correct copy of a

Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction, dated October 25, 2007. Attached hereto as Exhibit B is a true and correct copy of a Stipulation and Order Modifying Temporary Restraining Order dated October 26, 2007.

4. Subsequently, with Mr. Conroy's cooperation, I visited his home (where the Monroe documents had been stored for many years), and supervised the inventorying and removal of the documents to a secure location. The documents have since been held under lock and key and, under my supervision, have been reviewed, scanned, and produced in this litigation. The aged originals of any of the documents with the "MC" designation will be made available for the Court's inspection at any time should it so request.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of March, 2008, in Los Angeles, California.


Laura Wytsma